BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

)

)

)

)

)

)

In the Matter of the Application of the Ohio Development Services Agency for an Order Approving Adjustments to the Universal Service Fund Riders of Jurisdictional Ohio Electric Distribution Utilities.

Case No. 18-976-EL-USF

OHIO DEVELOPMENT SERVICES AGENCY'S MOTION FOR CONTINUANCE AND REQUEST FOR EXPEDITED RULING

Now comes the Ohio Development Services Agency ("ODSA"), pursuant to O.A.C. 4901-1-12, and respectfully requests the Public Utilities Commission of Ohio to continue the hearing scheduled in this matter for November 27, 2018, to December 5, 2018. ODSA also requests that an expedited ruling be issued pursuant to O.A.C. 4901-1-12(C), and certifies that all parties to this proceeding have been contacted about this request and none objects to the continuance or the expedited ruling. The grounds for ODSA's motion are set forth in the attached Memorandum in Support.

Respectfully submitted,

inson

Dane Stinson (Reg. No. 0019101) BRICKER & ECKLER LLP 100 South Third Street Columbus, OH 43215-4291 Telephone: (614) 227-2300 Facsimile: (614) 227-2390 dstinson@bricker.com

Attorney for Ohio Development Services Agency

MEMORANDUM IN SUPPORT

Pursuant to R.C. 4928.52, et seq., the Ohio Development Services Agency ("ODSA") is the administrator of the universal service fund ("USF") and the low-income customer assistance programs for electric distribution customers. ODSA filed a Notice of Intent to File an Application for Adjustments to Universal Service Fund Riders ("Notice") on May 31, 2018, indicating that the application would be amended to incorporate additional actual test-period data that became available subsequent to filing the initial application. The Public Utilities Commission of Ohio ("PUCO") approved the Notice by Opinion and Order issued September 19, 2018.

ODSA filed the initial application on October 31, 2018. On that same date, the PUCO issued an order in Case No. 17-1382-EL-UNC, which instructed AEP Ohio to work with ODSA and PUCO Staff to apply the balance of the undistributed fuel adjustment clause refund ("FAC Refund") and the undistributed significantly excessive earnings test refund ("SEET Refund") to the AEP Ohio USF revenue requirement to be collected in 2019. By entry of November 1, 2018, hearing was scheduled in this matter for November 27, 2018.

ODSA is in the process of finalizing the amended application to incorporate actual data obtained from the electric distribution utilities for the month of September 2018, as well as the refund ordered in Case No. 17-1382-EL-UNC. However, due to absences during the Thanksgiving holiday, ODSA will not be able to ensure that all parties have ample opportunity by the November 27 hearing date to review the amended application and engage in discussions to attempt to reach a stipulated resolution of this proceeding. Settlement of this case will result in time and cost savings to the parties and promote administrative efficiency. Accordingly, ODSA requests that this matter be continued until December 5, 2018.

ODSA also requests that an expedited ruling be issued pursuant to O.A.C. 4901-1-12(C) considering the imminent November 27 hearing. ODSA certifies that all parties to this proceeding have been contacted about this request and none objects to the continuance or the expedited ruling.

Respectfully submitted,

Dane Stinson

Dane Stinson (Reg. No. 0019101) BRICKER & ECKLER LLP 100 South Third Street Columbus, OH 43215-4291 Telephone: (614) 227-2300 Facsimile: (614) 227-2390 dstinson@bricker.com

Attorney for Ohio Development Services Agency

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Motion for Continuance and Request for Expedited Ruling* has been served upon the following parties by electronic mail this 20th day of November 2018.

Jane Stinson

Dane Stinson

Steven T. Nourse Christen M. Blend AEP Service Corporation 1 Riverside Plaza Columbus, Ohio 43215 stnouse@aep.com cmblend@aep.com

Randall V. Griffin Judi L. Sobecki Michael Schuler The Dayton Power & Light Company MacGregor Park 1065 Woodman Avenue Dayton, Ohio 45432 Randall.Griffin@dplinc.com Judi.Sobecki@dplinc.com michael.schuler@aes.com

Elizabeth H. Watts Duke Energy Ohio, Inc. 155 East Broad Street Columbus, Ohio 43215 Elizabeth.Watts@duke-energy.com

Amy Botschner-O'Brien Christopher Healey Ohio Consumers' Counsel 65 East State Street, 7th Floor Columbus, Ohio 43215-3485 Amy.botschner.obrien@occ.ohio.gov Christopher.Healey@occ.oh.us William L. Wright Section Chief, Public Utilities Section Thomas W. McNamee Assistant Attorney General 30 East Broad Street, 16th Floor Columbus, Ohio 43215 William.Wright@ohioattorneygeneral.gov Thomas.McNamee@ohioattorneygeneral.gov

Angela Paul Whitfield Kimberly W. Bojko Carpenter Lipps & Leland LLP 280 North High Street, Suite 1300 Columbus, Ohio 43215 Bojko@capenterlipps.com Paul@carpenterlipps.com

Carrie M. Dunn Joshua R. Eckert Christine Watchorn FirstEnergy Corp. 76 South Main Street Akron, Ohio 44308 cdunn@firstenergycorp.com jeckert@firstenergy.com cwatchorn@ulmer.com

Colleen L. Mooney Ohio Partners for Affordable Energy PO Box 1793 231 West Lima Street Findlay, Ohio 45839-1793 cmooney@ohiopartners.org Sam Randazzo Frank P. Darr Matthew Pritchard McNees, Wallace & Nurick Fifth Third Center 21 East State Street, Suite 910 Columbus, Ohio 43215 sam@mwncmh.com fdarr@mwncmh.com mpritchard@mwncmh.com This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

11/20/2018 4:29:59 PM

in

Case No(s). 18-0976-EL-USF

Summary: Motion for Continuance and Request for Expedited Ruling electronically filed by Dane Stinson on behalf of Ohio Development Services Agency